



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007

SEP 21 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hoffman
Project Manager - Remediation
Ashland Inc.
500 Hercules Road
Wilmington, DE 19808-1599

Re: LCP Chemicals, Inc. Superfund Site - **Bill for Collection No. 2721526S0061**

Dear Mr. Hoffman:

This letter serves as Bill for Collection No. 2721526S0061, which was prepared by the U.S. Environmental Protection Agency ("EPA"), Region 2, for recovery of EPA response costs for the LCP Chemicals, Inc. Superfund Site ("Site") under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9601, *et seq.* This Bill for Collection is issued to you pursuant to Section XX, paragraph 76 of the Administrative Order on Consent ("AOC"), Index No. II-CERCLA-02-99-2015, signed by EPA and ISP Environmental Services, Inc. ("ISP"). Attachment A to this letter is an itemized cost summary and narrative statement for response costs paid during the time period January 1, 2014 to February 25, 2014.

Please refer to the Superfund Cost Recovery Package Imaging and On-Line System ("SCORPIOS") report, covering the period January 1, 2014 to February 25, 2014, enclosed with this letter for your review. EPA reserves the right to recover costs paid during the time period covered by this bill, but which have not been included in this bill.

Pursuant to Section XX, paragraph 76 of the AOC, you are responsible for remitting payment in the amount of \$27,001.01 within 30 days from receipt of this bill via electronic funds transfer ("EFT"), as specified below.

You must instruct your bank to remit payment via EFT to EPA's account at the Federal Reserve Bank of New York, accompanied by the following information:

- i. EFT to be directed to: **Federal Reserve Bank of New York**

- ii. Bank routing number: **021030004**
- iii. Bank account number receiving payment: **68010727**
- iv. SWIFT address: **FRNYUS33**
- v. Address: **Federal Reserve Bank of New York**
33 Liberty Street
New York, NY 10045
- vi. Field tag 4200 of Fedwire message to read (for Fedwire payments):
D 68010727 Environmental Protection Agency
- vii. Case number: **II-CERCLA-02-99-2015**
- viii. Amount of payment: **\$27,001.01**
- ix. Name of remitter: **ISP Environmental Services, Inc.**
- x. Site name: **LCP Chemicals, Inc. Superfund Site**
- xi. Site/Spill identifier: **02 - HU**

To ensure that your payment is properly recorded, you are required to notify EPA contemporaneously with the payment. You must send either an email or a letter which references the date of the EFT, the payment amount, the name of the Site, the site identification number, the case number, and your name and address to:

Jon Gorin
Remedial Project Manager
New Jersey Remediation Branch
Emergency & Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866
email: gorin.jonathan@epa.gov

as well as to:

Frank Cardiello
Assistant Regional Counsel
Office of Regional Counsel
290 Broadway, 17th Floor
New York, NY 10007-1866
email: cardiello.frank@epa.gov

and to:

Elizabeth Kellum
U.S. EPA
26 W. Martin Luther King Drive
Attention: FINANCE
MS: NWD
Cincinnati, Ohio 45268
emails: kellum.elizabeth@epa.gov and cinwd_acctsreceivable@epa.gov

The United States reserves its right to recover any oversight costs paid during that time period covered by this accounting but not included in this Bill, and all other future response costs pursuant to the AOC.

EPA reaffirms its commitment to conduct appropriate and cost-effective oversight of work performed by consenting parties while ensuring protective cleanups. To this end, EPA would once again like to offer to discuss with you its plans for the oversight of ongoing work at the Site, and to provide you with the opportunity to suggest ways to effectively streamline the work and its oversight.

If you are interested in discussing work at the Site, or if you have questions regarding this Bill for Collection, please contact Jon Gorin at (212) 637-4361. Legal inquiries should be directed to Mr. Frank Cardiello, Assistant Regional Counsel, at (212) 637-3148.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carole Petersen".

Carole Petersen, Chief
New Jersey Remediation Branch

Enclosures

**Summary of Response Costs Paid by EPA from 01/01/2014 through 02/25/2014
LCP Chemicals, Inc. Superfund Site, Linden, NJ**

Payroll:

This consists of direct EPA personnel charges for time spent by EPA employees in, among other activities, reviewing and commenting on deliverables and overseeing Settling Defendants adherence to the requirements of the AOC. See attached Payroll sections (Regional + Headquarters) of EPA's Itemized Cost Summary.

Total Payroll Costs: \$ 15,002.22

Response Action Contract – (RAC2)

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee ("CDM") for oversight of ISP's performance of the work required under the AOC.

CDM Costs: \$ 3,742.80

Other Expenditures (OTH)

This includes costs paid by EPA for ENSOFTEK to perform records management and document control of Site-related documents.

ENSOFTEK Costs \$ 768.60

Indirect Costs:

Indirect Costs are disbursements from the Superfund for the operation and management of the Superfund Program which are not direct costs (*i.e.*, disbursements recorded in individual Superfund site accounts in EPA's financial management system). Indirect costs are allocated to particular Superfund sites by means of a methodology established by EPA Headquarters. See attached worksheet for calculation of indirect costs.

Total Indirect Costs: \$ 7,487.39

TOTAL EPA COSTS IN THIS BILLING: \$ 27,001.01

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Narrative Cost Summary

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

1. The United States Environmental Protection Agency has incurred at least \$13,061.56 for Regional Payroll Costs.
2. The United States Environmental Protection Agency has incurred at least \$1,940.66 for Headquarters Payroll Costs.
3. The United States Environmental Protection Agency has incurred costs of at least \$768.60 for OTHER EXPENDITURES (OTH) contract expenditures. The total represents the amount spent under the ENSOFTEK contract.
4. The United States Environmental Protection Agency has incurred costs of at least \$3,742.80 for RESPONSE ACTION CONTRACT - 2 contract expenditures. The total represents the amount spent under the CDM FEDERAL PROGRAMS CORPORATION contract.
5. The United States Environmental Protection Agency has incurred at least \$7,487.39 for Indirect Costs.

Total Site Costs:

\$27,001.01

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Itemized Cost Summary

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

REGIONAL PAYROLL COSTS	\$13,061.56
HEADQUARTERS PAYROLL COSTS	\$1,940.66
OTHER EXPENDITURES (OTH)	
ENSOFTEK (EPS21101)	\$768.60
RESPONSE ACTION CONTRACT - 2	
CDM FEDERAL PROGRAMS CORPORATION (EPW09002)	\$3,742.80
EPA INDIRECT COSTS	\$7,487.39
Total Site Costs:	\$27,001.01

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Regional Payroll Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
BENROUBI, ALBERT	2014	09	2.00	119.61
		10	1.00	59.81
			<u>3.00</u>	<u>\$179.42</u>
CARDIELLO, FRANK	2014	07	4.00	321.51
		08	10.25	823.86
		09	11.25	913.20
		10	17.25	1,400.27
			<u>42.75</u>	<u>\$3,458.84</u>
GORIN, JONATHAN	2014	07	9.00	691.33
		08	20.00	1,536.30
		09	31.00	2,408.05
		10	11.00	854.46
			<u>71.00</u>	<u>\$5,490.14</u>
OCONNELL, KIMBERLY	2014	07	11.00	931.89
		08	5.00	423.60
		09	10.00	855.66
			<u>26.00</u>	<u>\$2,211.15</u>
PEREZ, ALEXIDA	2014	10	2.00	158.81
			<u>2.00</u>	<u>\$158.81</u>
PETERSEN, CAROLE	2014	07	8.00	688.93
		09	3.00	260.86
		10	0.75	65.20
			<u>11.75</u>	<u>\$1,014.99</u>
PRINCE, JOHN	2014	07	2.50	223.43
			<u>2.50</u>	<u>\$223.43</u>
ROONEY, JAMES	2014	10	0.50	42.04
			<u>0.50</u>	<u>\$42.04</u>

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Regional Payroll Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
YU, MEI	2014	10	4.00	282.74
			4.00	\$282.74
Total Regional Payroll Costs			163.50	\$13,061.56

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Headquarters Payroll Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
KELLER, MELANIE	2014	07	5.75	317.88
		08	0.75	41.46
		09	4.00	242.46
			10.50	\$601.80
LEGARE, AMY	2014	07	3.00	281.03
			3.00	\$281.03
SU, CHUNMING	2014	07	15.00	1,057.83
			15.00	\$1,057.83
Total Headquarters Payroll Costs			28.50	\$1,940.66

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Contract Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

OTHER EXPENDITURES (OTH)

Contractor Name: ENSOFTEK

EPA Contract Number: EPS21101

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	3	11/06/2013	01/05/2014

Project Officer(s): KEATING, ROBERT

Dates of Service: From: 11/06/2013 To: 01/05/2014

Summary of Service: RECORDS MANAGEMENT, DOCUMENT CONTROL

Total Costs: \$768.60

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
26	12/18/2013	102,438.27	AVC140067 01/08/2014	447.45
27	01/15/2014	90,177.41	AVC140082 01/30/2014	321.15
			Total:	<u><u>\$768.60</u></u>

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Contract Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

RESPONSE ACTION CONTRACT - 2

Contractor Name: CDM FEDERAL PROGRAMS CORPORATION
EPA Contract Number: EPW09002
Project Officer(s): STATES, ABBEY
Dates of Service: From: 11/23/2013 To: 12/21/2013
Summary of Service: RESPONSE ACTION CONTRACT-SUBCLASS(REDI)
Total Costs: \$3,742.80

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
61-3320	12/16/2013	431,116.50	AVC140082 01/30/2014	2,221.82
62-3320	01/17/2014	493,767.14	AVC140085 02/04/2014	1,520.98
			Total:	<u>\$3,742.80</u>

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EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate(%)</u>	<u>Indirect Costs</u>
2014	19,513.62	38.37%	7,487.39
	<u>19,513.62</u>		
Total EPA Indirect Costs			<u>\$7,487.39</u>

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EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
BENROUBI, ALBERT	2014	09	119.61	38.37%	45.89
		10	59.81	38.37%	22.95
			<u>179.42</u>		<u>\$68.84</u>
CARDIELLO, FRANK	2014	07	321.51	38.37%	123.36
		08	823.86	38.37%	316.12
		09	913.20	38.37%	350.39
		10	1,400.27	38.37%	537.28
			<u>3,458.84</u>		<u>\$1,327.15</u>
GORIN, JONATHAN	2014	07	691.33	38.37%	265.26
		08	1,536.30	38.37%	589.48
		09	2,408.05	38.37%	923.97
		10	854.46	38.37%	327.86
			<u>5,490.14</u>		<u>\$2,106.57</u>
KELLER, MELANIE	2014	07	317.88	38.37%	121.97
		08	41.46	38.37%	15.91
		09	242.46	38.37%	93.03
			<u>601.80</u>		<u>\$230.91</u>
LEGARE, AMY	2014	07	281.03	38.37%	107.83
			<u>281.03</u>		<u>\$107.83</u>
OCONNELL, KIMBERLY	2014	07	931.89	38.37%	357.57
		08	423.60	38.37%	162.54
		09	855.66	38.37%	328.32
			<u>2,211.15</u>		<u>\$848.43</u>

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EPA Indirect Costs

LCP CHEMICAL, LINDEN, NJ SITE ID = 02 HU

COSTS 01/01/2014 - 02/25/2014 (PP07 FY14 - PP10 FY14)

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
PEREZ, ALEXIDA	2014	10	158.81	38.37%	60.94
			158.81		\$60.94
PETERSEN, CAROLE	2014	07	688.93	38.37%	264.34
		09	260.86	38.37%	100.09
		10	65.20	38.37%	25.02
			1,014.99		\$389.45
PRINCE, JOHN	2014	07	223.43	38.37%	85.73
			223.43		\$85.73
ROONEY, JAMES	2014	10	42.04	38.37%	16.13
			42.04		\$16.13
SU, CHUNMING	2014	07	1,057.83	38.37%	405.89
			1,057.83		\$405.89
YU, MEI	2014	10	282.74	38.37%	108.49
			282.74		\$108.49
Total Fiscal Year 2014 Payroll Direct Costs:			15,002.22		\$5,756.36

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPS21101	26	01/08/2014	447.45	0.00	38.37%	171.69

